

EAST CENTRAL INTERGOVERNMENTAL ASSOCIATION

A Regional Response to Local Needs

January 28, 2008

Surface Transportation Board
Attn: Section of Environmental Analysis
Finance Docket No. 35081
395 E Street S.W.
Washington, DC 20423-0001



Suite 200
3999 Pennsylvania Avenue
Dubuque, IA 52002

RE: Finance Docket: 35081
Proposed acquisition of the Dakota, Minnesota & Eastern Railroad (DM&E) by the
Canadian Pacific Railway.

Dear Administrator Boardman:

The Dubuque Metropolitan Area Transportation Study (DMATS) is writing in supportive of the City of Dubuque's comment on the acquisition of the DM&E by the Canadian Pacific Railway hereby referred to as Applicant.

DMATS, a multi-state and multi-jurisdictional Metropolitan Planning Organization (MPO) for the region, is not opposed to the acquisition. However, we are concerned about the State of Iowa being provided with equal protection by the Board as the states of Wyoming, South Dakota and Minnesota received.

DMATS asks the Surface Transportation Board to consider the following factors in rendering their decision on the Petition of the Applicant.

The Applicants allege that the proposed transaction would not result in any increase in rail traffic, train operations, or yard activity that exceeds the thresholds for environmental review. In 2006, it was estimated that Dubuque would see five additional coal trains per day. The credibility of estimates must be seriously evaluated.

"As several commenters note, environmental review in the Construction case was based on forecasts of up to 34 coal trains per day coming out of the PRB on DM&E's new rail line. These 34 coal trains must be projected to move somewhere, but Applicants' Environmental Appendix does not explain why only 5-8 of those trains would be routed over former IMRL lines."

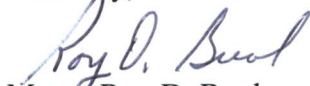
The Applicants must be held accountable to protect communities along their tracks from substantial harm, including but not limited to environmental assessment, upgraded tracks, crossings and safety features. The speeds of the trains should also be addressed.

The increase in coal trains will not only impact the City of Dubuque but also the rail corridor and communities throughout Iowa along the Mississippi River. Communities in both Illinois and Wisconsin such as East Dubuque and Prairie Du Chien should also be taken into consideration as to the impacts they will experience from the coal train traffic

Finally, DMATS appreciates the economic importance the Applicant's project has on the region, but we ask that the Surface Transportation Board balance the economic interest with the lives and economics of the citizens and businesses in the DMATS region as well as across Iowa, Illinois and Wisconsin.

Thank you for your time and consideration of this matter. If you have questions regarding this filing, please contact me at 563-588-4265 or Kelley Deutmeyer, Executive Director at 563-556-4166.

Sincerely,



Mayor Roy D. Buol

Chairperson

Dubuque Metropolitan Transportation Study (DMATS)

cc: DMATS Policy Board Members

Fred Dean, Iowa Dept. of Transportation

Molly Grover, Dubuque Area Chamber of Commerce

Jerry Enzler, National Mississippi River Museum and Aquarium

Rick Dickson, Greater Dubuque Development Corporation

Cindy Steinhauser, Assistant City Manager

Terry Goodman, Assistant City Manager

Senator Charles Grassley

Senator Tom Harkin

Congressman Bruce Braley

Iowa Legislators

Wisconsin Legislators

Illinois Legislators